

LINDA WONG Member of NJ, PA, NY, VA, GA and DC Bars

lwong@wongfleming.com

February 20, 2025

VIA ECF

**ORDER** 

The Honorable Georgette Castner, U.S.D.J. U.S. District Court for the District of New Jersey Clarkson S. Fisher Building and U.S. Courthouse 402 East State Street Trenton, New Jersey, 08608 IT IS SO ORDERED this 26th day of February 2025

Hon. Justin T. Quinn, U.S.M.J.

Re: <u>Jane Doe v. Princeton University</u>, Case No.: 3:21-cv-20264-GC-JTQ, Consent Request for Extension of Deadlines for S for Summary Judgment Briefing

Dear Judge Castner:

This law firm, along with Crowell & Moring LLP, represents Defendant The Trustees of Princeton University (the "University)<sup>1</sup> in the above-captioned case. Pursuant to Your Honor's Judicial Preferences, we write to respectfully request an extension of the briefing schedule ordered by this Court on January 23, 2025. *See* ECF No. 61.<sup>2</sup> Counsel seeks an extension in light of competing deadlines and unforeseen case developments and client needs.

Plaintiff's counsel does not oppose this request. The Parties have conferred and agreed upon the following amended summary judgment briefing schedule, with the papers to be filed with the Court in the "bundled" fashion ordered, *see id*.:

- Defendant to serve Plaintiff with opening brief: March 14, 2025
- Plaintiff to serve Defendant with opposition papers: May 5, 2025
- Defendant to serve Plaintiff with reply papers: June 6, 2025
- Parties to file motion papers via CM/ECF by: June 9, 2025

The Parties respectfully request that this Court amend the Pretrial Scheduling Order (ECF No. 43) and briefing schedule ordered by this Court (ECF No. 61) to reflect this revised proposed summary judgment briefing schedule.

821 ALEXANDER ROAD, SUITE 200 • P.O. BOX 3663 • PRINCETON, NJ 08543-3663 TEL: (609) 951-9520 • FAX: (609) 951-0270

<sup>&</sup>lt;sup>1</sup> Jane Doe's Complaint is against "Princeton University." The proper party for actions involving the University, however, is "The Trustees of Princeton University.

<sup>&</sup>lt;sup>2</sup> The current summary judgment briefing schedule requires Defendant to serve Plaintiff with its opening brief on February 28, 2025; Plaintiff to serve its opposition papers on April 14, 2025; Defendant to serve its reply papers on May 16, 2025; and the Parties to submit their bundled filing via ECF by May 19, 2025. *See* ECF No. 61.

Thank you for Your Honor's consideration in this regard.

Respectfully submitted,

WONG FLEMING

## /s/ Linda Wong

Linda Wong, Esq. 821 Alexander Road, Suite 200 Princeton, NJ 08540 lwong@wongfleming.com

## CROWELL & MORING LLP

## /s/ Amanda Shafer Berman

Amanda Shafer Berman, Esq. (pro hac vice) Eli Berns-Zieve, Esq. (pro hac vice) 1001 Pennsylvania Ave., N.W. Washington, D.C., 20004 aberman@crowell.com eberns-zieve@crowell.com

Counsel for Defendant The Trustees of Princeton University, a not-for-profit educational corp. of the State of New Jersey